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California Striped Bass Association

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April 24, 1996

State Board

APR 29 1996

Lester Snow
Executive Director
CALFED Bay-Delta Program
1416 9th Street, Suite 1155
Sacramento CA 95814

RE: Comments to 10 Draft Alternatives

Dear Lester:

The purpose of this letter is to convey some of the preliminary concerns and comments of the California Striped Bass Association with respect to the 10 Draft Alternatives. The CSBA is dedicated to the preservation, conservation and enhancement of the striped bass. Our comments are guided accordingly.

We have an initial concern, one raised by other program participants, that the Bay-Delta program does not clearly adopt the goal of the CVPIA of doubling the populations of anadromous fish. This goal should be formally adopted before the 10 Draft Alternatives are reduced to 3 or 5 Alternatives in the next phase of the program. It should also be noted that the California Fish and Game Commission has adopted a policy promoting the restoration of the striped bass fishery and has set a target adult population of 3 million fish. The adult population has declined from an estimated 3 million fish in 1960 to fewer than 400,000 in 1995.

There are several references in the 10 Alternatives in which the informed reader recognizes discrimination between Delta "native" and "anadromous" fish, the latter apparently referring to the striped bass. There is absolutely no basis for this discrimination, scientific or otherwise, and the striped bass must be given equal treatment in the Bay-Delta Program as it is in the CVPIA.

Several of the Alternatives include the Fisheries Management "Activity" of conducting pen-rearing of striped bass to "supplant" natural production. Webster's defines "supplant" as "1. To take the place of; supersede, especially through force, scheming, or treachery. 2. To remove or uproot in order to replace with something else." We trust that this was simply an oversight by the drafters and that the intended action is to supplement natural production. Our further concern is with the cap of 100,000 fish stated in these Alternatives. This figure is wholly inadequate to respond to the losses caused by pumping entrainment and reduced water quality due to water diversions. Furthermore, there is no indication in the Workshop 6 Information Packet, or other program materials, as to the source of the 100,000 fish limit, or reference to any studies upon which this limit may have been based. The information available from Fish and Game suggests that this number of hatchery-raised fish would have no viable impact in

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increasing the number of adult fish. An explanation of this Activity is necessary as is correction of the Activity description.

While references to the new real-time fish monitoring program and adaptive management are encouraging, there is no clear policy or procedure identified for the implementation of pumping restrictions, in those Alternatives incorporating this approach. These policies must be established in order to effectively reduce entrainment losses during those periods critical to the striped bass offspring.

In general, we support demand management and habitat restoration. We particularly support shallow tidal habitat restoration benefiting the Delta smelt. However, these activities, without extensive screening of diversions and pumping management, do not go far enough.

Opposition has been raised to the proposal to retire marginally productive agricultural property, set forth in several of the Alternatives. We note that much of this land would not even be considered "marginally" productive if the true cost of water were considered.

Finally, several of the Alternatives will be prohibitively expensive and politically unpopular as apparent efforts to revive the Peripheral Canal. These proposals fail to even address the major objectives of the Bay-Delta Program of providing ecosystem quality, water supply reliability, water quality (for all users), and reduced system vulnerability.

I would appreciate a staff response to the questions raised as to the pen-raising program.

Sincerely,



Ralph Draudson
President
California Striped Bass Association

cc: Pietro Parravano
Richard Izmirian